

**In the United States Bankruptcy Court
Western District of Pennsylvania
Erie Division**

In Re: Debra A Alexander	:	Bankruptcy No. 18-10804
Debtor	:	
	:	Chapter 13
U.S.Bank Trust National Association, not in its	:	
individual capacity, but solely as Trustee of LSF8	:	
Master Partition Trust	:	
Movant	:	
	:	
	:	
v.	:	Related to Document No. 134 & 135
Debra A Alexander	:	
Respondent	:	

RESPONSE IN OPPOSITION TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Debtor, by and through her counsel, John E. Nagurney, Esquire, and they respectfully responds to the Motion for Relief from Stay as follows:

1. Admits Allegation #1.
2. Admits Allegation #2.
3. Admits Allegation #3.
4. Admits Allegation #4.
5. Admits Allegation #5.
6. Admits Allegation #6.
7. Admits that the stated amounts were paid to the Crawford County TCB and to Vernon Township, Crawford County, PA as alleged in Allegation #7.
8. Responding to Allegation #8, Admits that the total amount paid was \$9,667.80; \$7,912.54 to the Crawford County Tax Claim Bureau; and \$1755.26 to the Vernon Township Tax Receiver.
9. Responding to Allegation #9, refers to the Proof of Claim for its terms to the extent that such information is now relevant.
10. Responding to Allegation #10, refers to the referenced Schedule for its terms.

11. Admits Allegation #11.
12. Admits Allegation #12.
13. Responding to Allegation #13, avers that said allegation is a conclusion of law which requires no response; and alternatively denies knowledge or information sufficient to respond.
14. Denies Allegation #14, and further responds that based upon the alleged property value of \$130,000.00, the alleged outstanding principal balance of \$2078.46 and the property tax advance of \$9,667.80 ; the Movant is adequately protected.
15. Responding to Allegation #15, avers that said allegation is a conclusion of law which requires no response; and alternatively denies knowledge or information sufficient to respond.

Affirmative Response

16. Upon information and belief, the fund needed to pay the tax amount advanced by the Movant will be available or substantially available upon the Debtor's receipt of her 2023 Federal Tax Return and other sources.

WHEREFORE, Counsel respectfully requests an Order Denying the requested Relief from Stay.

Respectfully submitted,

By: /s/ John E. Nagurney, Esq.

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